

**Cross-Motion Hearing Date: March 7, 2018 at 10:00 a.m. (EST)**  
**Cross-Motion Objection Deadline: March 5, 2018 at 12:00 p.m. (EST)**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case. No.
	:	
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF CROSS-MOTION OF WILMINGTON  
TRUST, NATIONAL ASSOCIATION, AS TRUSTEE FOR  
STRUCTURED ASSETS SECURITIES CORPORATION  
MORTGAGE PASS-THROUGH CERTIFICATES, SERIES  
2006-S4, TO ESTIMATE RMBS CLAIMS FOR SASCO  
2006-S4 FOR RESERVE PURPOSES AND FOR RELIEF  
FROM THE PROTOCOL ORDER**

**PLEASE TAKE NOTICE** that, on March 7, 2018 at 10:00 a.m. (EST), or as soon thereafter as the matter may be heard, before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 623 of the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York, 10004 (the “**Hearing**”), Wilmington Trust, National Association, solely in its capacity as Trustee of the Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2006-S4 Trust (“**SASCO 2006-S4**”), will cross-move for an order, substantially in the form attached as Exhibit A to the *Objection of Wilmington Trust, National Association, as Trustee for Structured Assets Securities Corporation*

*Mortgage Pass-Through Certificates, Series 2006-S4, to Lehman Brothers Holdings Inc.’s Motion to Estimate RMBS Claims of SASCO 2006-S4 for Reserve Purposes Pursuant to 11 U.S.C. § 502(c), and Cross-Motion to Estimate RMBS Claims for SASCO 2006-S4 for Reserve Purposes and for Relief from the Protocol Order* (filed contemporaneously herewith).

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the Cross-Motion must be made in writing, state with particularity the grounds therefor, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, be filed electronically in text searchable portable document format (PDF) with the Court in accordance with General Order M-399 (General Order M-399 can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Court), by registered users of the Court’s case filing system and by all other parties in interest (with a hard copy delivered directly to the Judge’s Chambers), and be served in accordance with General Order M-399, and upon (1) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 23; (2) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn: Paul V. Shalhoub, Esq., and Todd G. Cosenza, Esq.) and Rollin Braswell Fisher LLC, 8350 East Crescent Parkway, Suite 100, Greenwood Village, Colorado 80111 (Attn: Michael A. Rollin, Esq., and Maritza D. Braswell, Esq.), attorneys for LBHI and certain of its affiliates; (3) Holwell Shuster & Goldberg LLP, 750 Seventh Avenue, 26th Floor, New York, New York 10019 (Attn: Michael S. Shuster, Esq.) and Alston & Bird LLP, One Atlantic Center, 1201 West Peachtree Street, Suite 4900 Atlanta, Georgia 30309 (Attn: John C. Weitnauer, Esq.), attorneys for Wilmington Trust National Association, solely in its capacity as Trustee for SASCO 2006-S4; and (4) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York

10014 (Attn: William K. Harrington, Esq., Susan D. Golden, Esq., and Andrea B. Schwartz, Esq.) so as to be actually filed and received no later than March 5, 2018 at 12:00 p.m. (EST), (the “**Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE** that if no responses or objections are received by the Objection Deadline, the relief may be granted as requested in the Cross-Motion without further notice or a hearing.

**PLEASE TAKE FURTHER NOTICE** that you need not appear at the Hearing if you do not object to the relief requested in the Cross-Motion.

**PLEASE TAKE FURTHER NOTICE** that the Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or at a later hearing.

Dated: February 28, 2018

Respectfully Submitted,

By: /s/ Michael S. Shuster

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*Counsel for Wilmington Trust, National  
Association, solely in its capacity as Trustee  
for SASCO 2006-S4*